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February 28, 2023

**Via ECF**

Honorable Ronnie Abrams  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: *Patricia Cosme v. Goldberg & Associates, P.C. and Julie Goldberg***  
**Case No. 21-CV-7430 (RA)**  
**Plaintiff's Letter Motion for Extension of Time to File Default Motion**

Dear Judge Abrams:

We are counsel to the Plaintiff Patricia Cosme. On February 7, 2023, the Court granted Defendants' counsel's Motion to Withdraw and ordered Plaintiff to move for a default judgment (should she wish) by March 1, 2023.

To Plaintiff's knowledge, Defendants' have not retained new counsel. As such, Plaintiff intends on filing for Default against the Defendants. Plaintiff respectfully requests a brief nine-day extension from March 1, 2023 to March 10, 2023 to file the default motion. I have been out off the office for the last several days with a stomach virus. This is Plaintiff's first and only anticipated request for extension.

We thank the Court for its consideration of this request.

Respectfully submitted,

*/s/ Robert D. Salaman*

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Robert D. Salaman